

**REMARKS**

The Examiner is thanked for the careful examination of the application. However, in view of the foregoing amendments and the remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

**Informalities:**

Claims 9-12 have been objected to under 37 C.F.R. 1.75(c), as allegedly being of improper dependent form. In order to expedite prosecution of the application, claims 9-12 have been canceled. New claims 16-21 have been added, wherein the electrostatic attraction mechanism is described as being for use in a surface processing device. Applicants submit that the new claims 16-21 are in compliance with 37 C.F.R. §1.75(c) because they merely define the electrostatic attraction mechanism as being adapted for or suitable for use in a surface processing device. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the outstanding objection under 37 C.F.R. §1.75(c).

**Art Rejection:**

Claims 1-8 have been rejected under 35 U.S.C. §102(b) as being clearly anticipated by U.S. Patent No. 5,646,814, hereinafter Shamouilian. The present invention relates to an electrostatic attraction mechanism having a dielectric block and a pair of attraction terminals which are mounted inside the dielectric block. The electrostatic attraction mechanism further includes a power source or a means for applying a voltage to each of the attraction terminals to electrostatically attract a plate-shaped object to the dielectric block by inducing static electricity on the

attraction surface. Furthermore, the voltage applied to each of the terminals can be individually adjusted in order to control a surface potential of the plate-shaped object.

The Examiner's attention is directed to paragraphs 0038 and 0039 and Table 1 in the specification, wherein the results of an example of the present invention are disclosed.

In contrast to the present invention, Shamouilian is not concerned with using a pair of attraction terminals to control a surface potential on the plate-shaped object. Instead, Shamouilian uses a first electrode 22 to create an attractive electrostatic force that secures the chuck 20 to the support 44. See column 3, lines 56-66. The second electrode 24 is used to create an electrostatic force that holds the substrate 42 to the check 20. See column 4, lines 11-17.

Accordingly, in Shamouilian, the first electrode 22 does not receive a voltage to electrostatically attract a plate-shaped object to the dielectric block by inducing static electricity on the attraction force. Instead, the first electrode 22 is only concerned with creating an electrostatic force for securing the chuck 20 to the support 44. Accordingly, in Shamouilian, only one electrode, i.e., the electrode 24 is used to create an electrostatic force that would attract a plate-shaped object to the dielectric block.

Although Shamouilian does disclose alternative embodiments that include a plurality of electrodes 24 for attracting a plate-shaped object to the dielectric block, (Fig. 2a), the electrodes 24 are not individually adjusted in order to control surface potential of the plate-shaped object. In other words, the electrodes 24 in the embodiment illustrated in Figure 2a are not individually controlled, they are all controlled by the same voltage.

Accordingly, Shamouilian does not teach or suggest a plurality of electrodes that are individually controlled in order to electrostatically attract a plate-shaped object to the dielectric block by inducing static electricity on the attraction surface. Accordingly, claims 1, 4, and 7 are clearly patentable over Shamouilian.

Claim 2 depends from claim 1 and further defines a plurality of pairs of attraction terminals that are mounted inside the dielectric block. Shamouilian also does not teach or suggest a plurality of pairs of attraction terminals mounted inside the dielectric block, wherein the voltage applied to each of the terminals can be individually adjusted in order to control the surface potential of the plate-shaped object.

Furthermore, claims 2 and 3 depend from claim 1, and are thus patentable over Shamouilian at least for the reasons set forth above with respect to claim 1.

Claims 5 and 6 depend from claim 4, and are thus also patentable over Shamouilian at least for the reasons set forth above with respect to claim 1 and claim 2.

Claim 8 depends from claim 7, and thus is also patentable over Shamouilian at least for the reasons set forth above with respect to claim 7. In addition, Shamouilian does not teach or suggest that a controlling step is carried out while determining a relationship between the applied voltages and the surface potential by measuring in advance the surface potential of the plate-shaped object while respectively changing the voltages applied to the attraction terminals, and controlling the voltages applied to the attraction terminals in accordance with this relationship.

To further define the protection to which Applicants are entitled, new claims 13-27 are submitted herewith.

New claim 13 depends from claim 1 and further defines the pair of attraction terminals as being arranged inside the dielectric block in a substantially coplanar arrangement. Support for this feature can be found in the figures, including Figures 1 and 2. In Shamouilian, the plurality of electrodes are not arranged in a coplanar arrangement, they are stacked one on top of each other. Although the electrodes 24 in Figure 2a are coplanar, they are not individually controlled.

Claim 14 depends from claim 1 and further recites that a first of the pair of attraction terminals is larger in size than a second of the pair of attraction terminals support for this new claim may be found in Figure 3, as well as in the discussion in paragraph 36 of the present specification.

Claim 15 is the same as claim 14, except that it depends from claim 13.

The features of claims 13-15 are also not taught or suggested by Shamouilian.

Claim 16 is substantially similar to claim 1, except that the preamble recites that the electrostatic attraction mechanism is for use in a surface processing device. Accordingly, claim 16 and dependent claims 17-21 are patentable over Shamouilian at least for the reasons set forth above with respect to claims 1 and 2.

New dependent claims 22-24 are similar to claims 13-15, except that they depend from method claim 7. Accordingly, new claims 22-24 are also patentable over Shamouilian at least for the reasons set forth above with respect to claim 7 and 13-15.

Claim 25 depends from new claim 16, and further defines the control part, which was originally set forth in original claim 9. Claims 26 and 27 depend from claim 25, and further include the subject matter from original claims 10 and 12. New

claims 25-27 are patentable at least for the reasons as set forth above with respect to claim 16, and further include other features that are not taught or suggested by Shamouilian.

Accordingly, in view of the foregoing amendments and remarks, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections and to find the new claims to be in condition for allowance.

In the event that there are any questions concerning this response, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: June 1, 2004

By: William C. Rowland  
William C. Rowland  
Registration No. 30,888

P.O. Box 1404  
Alexandria, Virginia 22313-1404  
(703) 836-6620